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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**JOINT STATUS REPORT FOR
SEPTEMBER 30, 2025 DISCOVERY
STATUS CONFERENCE**

This Document Relates to:

ALL ACTIONS

Judge: Hon. Lisa J. Cisneros
Courtroom: G – 15th Floor

JOINT STATUS REPORT

In advance of the discovery status conference set for Thursday, September 30, 2025 at 10:30 am PST, Plaintiffs and Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Defendants” or “Uber”) (jointly, “the Parties”), respectfully submit this Joint Status Report.

Pending PTO 8 Disputes

Plaintiffs’ Proposed Joint Statement: The following PTO 8 briefs are currently pending before the Court: (1) Joint Letter regarding Uber’s production from Flack and/or Uber’s Dashboards. *See* ECF 3914. Pursuant to the Court’s September 22, 2025 Order, the Parties filed additional materials for the Court’s consideration on September 23, 2025. *See* ECF 3994. (2) Joint Letter regarding outstanding S-RAD Issues. *See* ECF 4009. The Parties will be prepared to discuss these letter briefs at the Discovery Status Conference.

I. Updates on Deposition Scheduling

Joint Statement: Attached as Exhibit A is a chart listing the completed and upcoming depositions.

II. WHB 823 – Redaction of Old Vineyard Behavioral Health Services Records

Joint Statement: Plaintiff produced redacted mental healthcare records from an in-patient facility at which Plaintiff received treatment, Old Vineyard Behavioral Health Services. Uber objected to the grounds of the redactions. Plaintiff has agreed to produce unredacted records in exchange for Uber’s agreement that the Old Vineyard records will not be the sole basis for Uber seeking to reopen the deposition of the Plaintiff. However, this agreement will not bar Uber from seeking to reopen the deposition of the Plaintiff on any other grounds and Uber will not be foreclosed from asking about the Old Vineyard Behavioral Health Services records at any future deposition of the Plaintiff. This agreement will not bar Plaintiff from opposing Uber’s attempts to reopen the deposition on any other grounds. Both parties agree to meet and confer on these issues should they arise in the future.

III. Ongoing Conferrals Regarding Sept. 3 Order on Uber’s Motion to Enforce Protective Order (ECF 3822)

Defendants’ Position: On September 3, 2025, the Court deferred ruling on Uber’s Motion to Enforce Protective Order and ordered Plaintiffs’ Co-Lead Counsel to “cooperate with Uber’s counsel in helping Uber to understand which Plaintiffs’ attorneys in this MDL had access to the JCCP filing at issue and how such access was managed.” ECF 3822, at 4. Consistent with that Order, Uber contacted Plaintiffs’ leadership and requested that they identify which Plaintiffs’ attorneys in the MDL

1 had access to the JCCP filings at issue to their knowledge and how such access was managed.
 2 According to information from the File & Serve system used for the JCCP litigation, representatives
 3 from MDL Plaintiffs' leadership were registered to receive the above-referenced filings through File
 4 & Serve. As part of their response, Uber requested that Plaintiffs' leadership account for all law firms
 5 with access to Plaintiffs' MDL shared document and work product depositories that Plaintiffs'
 6 leadership previously disclosed, and how their access was managed. In light of the deadlines set by
 7 the September 3 Order, Uber asked for a response by September 25.

8 To date, despite the September 3 Order, Plaintiffs have not provided any of the information
 9 requested by Uber. Plaintiffs should be ordered to provide that information – including (1) the
 10 identification of Plaintiffs' attorneys in this MDL that had access to the JCCP filings at issue, and (2)
 11 how such access was managed (which is consistent with this Court's Order), so the parties can further
 12 meet and confer within the deadlines set by the Court.

13 **Plaintiffs' Position:** As required by the Court's order, Co-Lead Counsel will provide Uber a
 14 list of law firms that had access to MDL shared workspaces containing exhibits submitted in
 15 connection with the JCCP summary judgment opposition by September 26, 2025. Uber has not
 16 presented Co-Lead Counsel with "specific, non-speculative reason(s) to believe that materials at issue
 17 were disclosed by a party or attorney in this MDL." ECF 3817.

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ATTESTATION

Pursuant to Civil Local Rule 5-1(h)(3), I hereby attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's consent and have authorized the filing.

Dated: September 25, 2025

By: /s/Laura Vartain Horn

CERTIFICATE OF SERVICE

I hereby certify that on September 25, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notification of the filing to all counsel of record.

By: /s/Laura Vartain Horn